

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

**DECLARATION OF MICHAEL R. TIERNEY, JR.**

I, Michael R. Tierney, Jr., declare under penalty of perjury as follows:

1. I have personal knowledge of the facts stated in this declaration, and if called as a witness, could competently testify to them.
2. I am employed as an attorney at the offices of McKenna Long & Aldridge LLP, located at 1900 K. Street, NW, Washington, DC 20006.
3. I am familiar with the ViewSonic VX700 LCD monitor with serial number A23032217476 purchased by Mr. Roger Greenbank in Delaware on July 11, 2003. I inspected that monitor at the offices of McKenna Long & Aldridge LLP in Washington, DC. My inspection of the ViewSonic VX700 LCD monitor confirmed that the monitor contained an LCD module manufactured by Chi Mei Optoelectronics Corp. ("CMO").

4. I am familiar with the ViewSonic VX800 LCD monitor with serial number A28030700598 purchased by Mr. Mark Donaldson in Delaware on July 12, 2003. I inspected that monitor at the offices of McKenna Long & Aldridge LLP in Washington, DC. My inspection of the ViewSonic VX800 LCD monitor confirmed that the monitor contained an LCD module manufactured by CMO.

5. I am familiar with the Iiyana Pro Lite LCD monitor with serial number 25077M2601058 that Mr. Donaldson purchased on August 22, 2003 in Delaware. I inspected that monitor at the offices of McKenna Long & Aldridge LLP in Washington, DC. My inspection of the Iiyana Pro Lite LCD monitor confirmed that the monitor contained an LCD module manufactured by CMO.

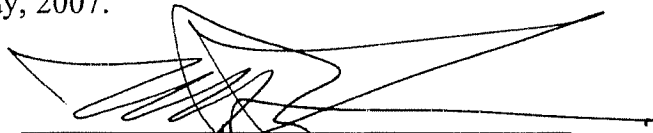
6. I am familiar with the Tatung L17AMTN-U01 LCD monitor with serial number 6SA322680010 that Mr. Lewis Hines purchased on September 8, 2003 in Delaware. I inspected that monitor at the offices of McKenna Long & Aldridge LLP. My inspection of the Tatung L17AMTN- U01 LCD monitor confirmed that the monitor contained an LCD module manufactured by CMO.

7. I am familiar with the VX700 LCD monitor with serial number A23033100054 that Mr. Gary Gray purchased on October 22, 2003 in Delaware. I inspected that monitor at the offices of McKenna Long & Aldridge LLP. My inspection of the VX700 LCD monitor confirmed that the monitor contained an LCD module manufactured by CMO.

8. I am familiar with the ViewSonic N2000 LCD TV with serial number C110042100347 that Mr. Dominic Desderio purchased on April 6, 2005 in Delaware. I inspected that monitor at the offices of McKenna Long & Aldridge LLP. My inspection of the ViewSonic N2000 LCD TV confirmed that the monitor contained an LCD module manufactured by CMO.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22<sup>nd</sup> day of May, 2007.

A handwritten signature in black ink, appearing to read "Michael R. Tierney, Jr.", written over a horizontal line.

Michael R. Tierney, Jr.

### **CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on May 22, 2007, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Edmond D. Johnson  
Thomas H. Kovach  
Pepper Hamilton LLP  
1313 Market Street, Suite 5100  
PO Box 1709  
Wilmington, DE 19899-1709

Karen L. Pascale  
John W. Shaw  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899-0391

Philip A. Rovner  
Dave E. Moore  
Potter Anderson & Corroon LLP  
1313 North Market Street  
Wilmington, DE 19899-0951

William E. Manning  
Jennifer M. Becnel-Guzzo  
Buchanan Ingersoll & Rooney  
The Brandywine Building  
1000 West Street, Suite 1410  
Wilmington, DE 19801

The undersigned counsel further certifies that copies of the foregoing document were sent by email to the above counsel on May 22, 2007, and will be sent by hand on May 22, 2007, and were sent by email on May 22, 2007, and will be sent by first class mail on May 22, 2007, to the following non-registered participants:

John N. Zarian  
Samia McCall  
Matthew D. Thayne  
J. Walter Sinclair  
Stoel Rives LLP  
101 S. Capitol Blvd., Suite 1900  
Boise, ID 83702

Vincent K. Yip  
Peter J. Wied  
Jay C. Chiu  
Paul, Hastings, Janofsky & Walker LLP  
515 South Flower Street  
Twenty-Fifth Floor  
Los Angeles, CA 90071

Kenneth R. Adamo  
Robert C. Kahrl  
Arthur P. Licygiewicz  
Jones Day  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114-1190

Bryan J. Sinclair  
Karineh Khachatourian  
Buchanan Ingersoll & Rooney  
333 Twin Dolphin Drive  
Redwood Shores, CA 94065-1418

/s/ Richard D. Kirk (rk922)  
Richard D. Kirk